



August 15, 2019

Regional Freedom of Information Officer
U.S. EPA, Region 1 (OARM01-6)
5 Post Office Square, Suite 100
Boston, MA 02109-3912
(617) 918-1102

Re: Freedom of Information Act Request

Dear Sir or Madam:

Pursuant to the Freedom of Information Act (FOIA), 5 U.S.C. 552 and 42 U.S.C. Section 9604(e)(7)(A),¹ I am requesting copies and/or access to records held at EPA's Region 1 office.

Records of interest include documents created, compiled, and submitted to the EPA under regulatory programs such as the Resource Conservation and Recovery Act (RCRA), the Toxic Substances Control Act (TSCA), Clean Air Act (CAA), the Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA), and the Emergency Planning and Community Right-to-Know Act (EPCRA).

Specifically, I am requesting release of a number of specific documents and types of documents held at Region 1 concerning the operations of Ciba-Geigy Corporation in Cranston, Rhode Island. Below, I have included information on the site occupant's name, address(es), any available facility ID numbers, and the types of documents requested. The following sections are arranged according to specific EPA regulatory programs.

At various times the company at this site have used names including, but possibly not limited to, the following:

- Ciba-Geigy Corporation
- Geigy Chemical Corporation
- BASF Corporation
- Alrose Chemical Company

¹ The relevant statutory text provides that: "Any records, reports, or information obtained from any person under this section (including records, reports, or information obtained by representatives of the President) shall be available to the public, [except for trade secrecy claims]. Trade secrecy claims are restricted by section 104(e)(7)(F).

RCRA Requested Documents

We understand that hazardous waste generated by Ciba-Geigy at 180 Mill Street, Cranston, RI was regulated under the Resource Conservation and Recovery Act (RCRA) and was assigned the following RCRA facility ID: RID001194323.

We request the following materials relating to this facility produced by the company as required by RCRA:

- RCRA Notification
- Part A application (Form 8700-12)
- Related inspections and correspondence for the period 1984 and earlier
- Work plans and closure documentation related to contamination processes and chemical releases
- Biennial hazardous waste reports from 1981-1985, 2005 and 2008-2014

We therefore request the following documents relating to this facility produced by the company as required by the RCRA:

- RCRA Notification
- Related inspections and correspondence for the period 1984 and earlier
- Work plans and closure documentation related to contamination processes and chemical releases
- Biennial hazardous waste reports from 1981 to 1985

Superfund Enterprise Management System

We understand that, under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), Ciba-Geigy at 180 Mill Street, Cranston, RI was identified as a possible Superfund site and was assigned the following facility ID: RID001194323. We therefore request the following documents related to these facilities produced as required under CERCLA:

- Work plans and closure documentation focusing on processes causing contamination and chemical releases.

TSCA Inventory Requested Documents

We understand that, under the chemical inventory provisions of the Toxic Substances Control Act (TSCA), Ciba-Geigy at 180 Mill Street, Cranston, RI identified certain chemicals used at their sites. We therefore request the following documents related to this facility produced as required by TSCA:

- 1986 Reporting Year Data
- 1990 Reporting Year Data

TSCA PCB Regulations

We understand that, under the PCB regulations adopted pursuant to section 6 of the Toxic Substances Control Act, that PCB waste materials may have been used or remediated at Ciba-Geigy / BASF at 180 Mill Street, Cranston, RI, which was identified with the following facility ID: RID001194323. We therefore request the following documents related to PCBs and this installations:

- Documentation of any PCB related notifications, inspections, and enforcement actions involving this location or parties.

We also request documentation regarding the following known PCB activity at 180 Mill Street, Cranston, RI:

Waste Manifests

- 2017 – 10,000 kgs of environmentally hazardous substances (PCB1/R007)
- 2017 – 386 kgs (<1 lb PCB) (RO15)
- 2016 – 4,545 kgs of PCB solids (VT01/R007)
- 1996 – 239,054 kgs of miscellaneous PCB wastes (B0007)
- 1995 – 4,495,132 kgs of miscellaneous PCB wastes (B0007)
- 1987 – 140 yards of miscellaneous PCB wastes (B0007)
- 1986 – 160 yards of miscellaneous PCB wastes (B0007)

Other Activity

- 2018 Generator – PCB Activity

AIR Requested Documents

We understand that Ciba-Geigy Corporation at 180 Mill Street, Cranston, RI operated under the regulation of the Clean Air Act with the following facility ID: RI0000004400700005.

We therefore request the following documents related to this facility:

- Air permit registration and application documents
- Inspection files
- Correspondence for 1976 and earlier

Request Information

History Associates requests the release of the above materials. If this is not possible, we request information as to why, as we understand that these collections are publically accessible under statutory regulations.

History Associates agrees to pay all reasonable and standard processing fees authorized by 5 U.S.C. 552(a)(4)(A) and the applicable regulations up to \$250. Should the fees exceed this

amount, please call me with an estimate of the total costs in order that specific expenditures beyond \$250 can be authorized.

Should you have any questions or concerns regarding this request, please contact me at (301) 279-9697 or via email at HBergen@historyassociates.com.

Sincerely,

Hilary Bergen